

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

MARCUS DARNELL WILHIDE

Case No. 21-30005

Judge: Unassigned

SEALED MATTER (kcm)

Filed: January 6, 2021

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 18, 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(g)(1)

*Offense Description*

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: January 6, 2021

City and state: Detroit, MI



Complainant's signature

Andrew White, Task Force Officer, FBI

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

MARCUS DARNELL WILHIDE,

Defendant.

Case No. 21-mj-30005

**FILED UNDER SEAL**

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Andrew White, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been a Border Patrol Agent with the United States Border Patrol since August 2009. I am currently assigned as a federal Task Force Officer (TFO) to the Federal Bureau of Investigation (FBI), Detroit FBI Violent Gang Task Force (VGTF), and I participate in investigations into street gangs committing various violations of federal law, including narcotics and weapons trafficking and violent crime. Prior to my current assignment, I was assigned to Michigan State Police (MSP) narcotics task force for three years. During my time as a Task Force Agent, I investigated narcotics trafficking by violent criminal organizations. I also initiated investigations involving narcotics, human trafficking, and other activities of violent criminal organizations. I have

participated in numerous investigations that resulted in the execution of federal search and arrest warrants.

2. I submit this affidavit in support of a criminal complaint charging that, on or about December 18, 2020, within the Eastern District of Michigan, the defendant, Marcus Darnell WILHIDE (D.O.B.: XX/XX/1998), knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

3. I make this affidavit from my personal knowledge of the investigation, as well as information provided by other law enforcement agents and witnesses, a review of court records, and information gained through my training and experience. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all details or facts that exist pertaining to the investigation.

#### **PROBABLE CAUSE**

4. On or about December 18, 2020, law enforcement officers, including MSP Troopers and FBI agents, executed a search warrant at a two-story townhouse residence located in Canton, Michigan (the “Target Residence”). The warrant was

issued by the 31st District Court of the State of Michigan and authorized the search of the Target Residence for, among other things, firearms and ammunition.

5. Prior to the execution of the warrant, law enforcement officers had established probable cause to believe Marcus WILHIDE resided at the Target Residence based on in-person surveillance and GPS location information from WILHIDE's tether (supervised by Wayne County Probation).

6. When law enforcement officers executed the search warrant on the morning of December 18, 2020, WILHIDE was present inside the Target Residence. The only other person found inside the Target Residence at the time of the search was a female who stated she had stayed overnight but did not reside there.

7. During the search of the Target Residence, law enforcement officers found a Rock River Arms .223 caliber pistol, bearing serial number AV4067993, on a couch in the living room area.

8. During the search of the Target Residence, law enforcement officers also found a Zastava Arms .223 caliber pistol, bearing serial number Z85-009245, on the floor of a bedroom. In that same bedroom, officers also found a photo of WILHIDE hanging on the wall, clothing consistent with WILHIDE's body size, and identification cards in WILHIDE's name.

9. Law enforcement officers also found a third firearm in the Target Residence, a Glock 19 Gen 5 9mm pistol, bearing serial number BPND608, as well as approximately 186 rounds of ammunition of various calibers.

10. I have reviewed WILHIDE's computerized criminal history report ("CCH"), as well as publicly available records from the Third Circuit Court, Wayne County, Michigan, which revealed he is a convicted felon. Specifically, in February 2017, WILHIDE pleaded guilty to felony unarmed robbery (in violation of Mich. Comp. Laws Ann. § 750.530) and in March 2017 was sentenced to four years of probation. Next, in January 2019, WILHIDE pleaded guilty to felony third-degree fleeing and eluding police officer (in violation of Mich. Comp. Laws Ann. § 257.602a(3)(a)) and in February 2019 was sentenced to six months in jail and two years of probation.

11. As a result of these felony guilty pleas, convictions, and sentences, there is probable cause to believe that WILHIDE knew he was a felon on December 18, 2020, when he possessed firearms inside the Target Residence.


12. According to ATF Special Agent Michael Jacobs, who is an expert in the interstate nexus of firearms, Rock River Arms firearms, Zastava firearms, and Glock firearms are not manufactured in the state of Michigan, and therefore he made a preliminary determination that the three firearms described above were

likely manufactured outside the state of Michigan and thus had traveled in interstate commerce from their points of manufacture to Michigan.

**CONCLUSION**

13. Based on the foregoing, I respectfully submit there is probable cause to believe that, on or about December 18, 2020, within the Eastern District of Michigan, the defendant, Marcus Darnell WILHIDE, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Zastava Arms .223 caliber pistol, bearing serial number Z85-009245, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted,

By:   
\_\_\_\_\_  
Andrew White  
Task Force Officer  
Federal Bureau of Investigation

Sworn to before me and signed in  
my presence and/or by reliable electronic means.



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HON. CURTIS IVY, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF MICHIGAN

Date: January 6, 2021